

## THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SUSTAINABLE FIBER TECHNOLOGIES  
LLC, a Nevada limited liability company,

Plaintiff,

V.

DARBY KREITZ, an individual, ALLNORTH CONSULTANTS LTD., a Canadian limited company; ALLNORTH AMERICAS INC., a Nevada corporation; RED LEAF FIBRE LTD., a Canadian limited company; and RED LEAF PULP, LTD., a Canadian limited company,

## Defendants.

CASE NO. 2:22-cv-00822-MJP

**STIPULATION AND ORDER FOR  
SECOND EXTENSION OF THE TIME  
FOR DEFENDANTS TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**NOTE ON MOTION CALENDAR:  
Wednesday, October 12, 2022**

Plaintiff Sustainable Fiber Technologies LLC (“Plaintiff”) and defendants Darby Kreitz, Allnorth Consultants Ltd., Allnorth Americas Inc., Red Leaf Fibre Ltd., and Red Leaf Pulp, Ltd. (collectively, “Defendants”; Plaintiff and Defendants, collectively, the “Parties”), by and through their counsel of record, respectfully submit this Stipulation—and respectfully request that the Court enter the subjoined proposed order—for a second extension of the time for Defendants to respond to Plaintiff’s Complaint.

STIPULATION AND ORDER FOR SECOND  
EXTENSION OF DEADLINE TO RESPOND TO  
COMPLAINT - 1  
CASE NO. 2:22-cv-00822-MJP

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1       1. WHEREAS, on June 12, 2022, Plaintiff filed the Complaint against Defendants in  
2 the above-captioned action [Dkt. No. 1].

3       2. WHEREAS, on July 22, 2022, Defendants signed a Waiver of the Service of  
4 Summons [Dkt. No. 9].

5       3. WHEREAS, on September 20, 2022, the Court granted the Parties' Stipulation and  
6 Order to Extend Time for Defendants to Respond to Plaintiff's Complaint [Dkt. No. 15].

7       4. WHEREAS, Defendants' response to Plaintiff's Complaint is due on October 19,  
8 2022.

9       5. WHEREAS, the Parties have been working cooperatively regarding the early stages  
10 of the litigation and continue to be engaged in substantial discussions of the matters at issue in this  
11 dispute.

12       6. WHEREAS, pursuant to the Parties' cooperation and discussions, the Parties  
13 participated in a full-day mediation session on September 22, 2022, and their mediation efforts  
14 remain ongoing.

15       7. WHEREAS, the Parties believe a 44-day extension of Defendants' deadline to  
16 respond to the Complaint will further facilitate the Parties' mediation efforts and discussions.

17       8. WHEREAS, the requested extension is made in good faith and not for the purpose  
18 of delay or other procedural advantage.

19       9. ACCORDINGLY, the Parties stipulate and respectfully request to extend  
20 Defendants' deadline to respond to Plaintiff's Complaint to December 2, 2022. A proposed order  
21 is subjoined herewith.

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD, on this 12<sup>th</sup> day of  
2 October, 2022.

3 **BUCHALTER**

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5 Bradley P. Thoreson, WSBA No. 18190

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13 *s/ Roger L. Scott*

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15 *s/ J. Rick Tachè*

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22 *Attorneys for Plaintiff Sustainable Fiber*  
23 *Technologies LLC*

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27 */s/Kit W. Roth*

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10 *Attorneys for Defendants*

